

GREGG M. FICKS (State Bar No. 148093)  
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*Special Counsel to Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**  
**PG&E CORPORATION,**  
**-and-**  
**PACIFIC GAS & ELECTRIC COMPANY,**  
**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in Lead Case No.  
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**FOURTH SUPPLEMENTAL  
DECLARATION OF GREGG M. FICKS  
PURSUANT TO 11 U.S.C. § 327(e) AND  
FED. R. BANKR. P. 2014(a) ON BEHALF  
OF SPECIAL COUNSEL COBLENTZ  
PATCH DUFFY & BASS LLP**

[Re: Dkt. Nos. 2595, 2596, and 2926]

[No Hearing Requested]

1 I, Gregg M. Ficks, declare:

2 1. I am a partner at the law firm of Coblentz Patch Duffy & Bass LLP ("**Coblentz**" or  
3 the "**Firm**"), resident in Coblentz's San Francisco office located at One Montgomery Street, Suite  
4 3000, San Francisco, CA 94104. I am a member in good standing of the State Bar of California,  
5 and of this Court. I submit this Declaration to supplement my declaration dated June 18, 2019  
6 [Docket No. 2596] (the "**Original Declaration**") and my declarations dated July 8, 2019 [Docket  
7 No. 2888], September 4, 2019 [Docket No. 3803], and November 22, 2019 [Docket No. 4844]  
8 (the "**Supplemental Declarations**") filed in support of, and/or related to, the Application of the  
9 above-captioned debtors and debtors in possession (collectively, "**PG&E**" or the "**Debtors**"), for  
10 an order, pursuant to section 327(e) of title 11 of the United States Code (the "**Bankruptcy**  
11 **Code**") and Rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the  
12 "**Bankruptcy Rules**"), approving the employment and retention of Coblentz as one of the Debtors'  
13 special counsel effective *nunc pro tunc* to January 29, 2019 (the "**Retention Application**") [Dkt.  
14 No. 2595]. Unless otherwise stated in this Declaration, I have personal knowledge of the matters  
15 set forth herein.

16 2. As anticipated in the Original Declaration, this declaration is submitted to  
17 supplement information disclosed in the Original Declaration and the Supplemental Declarations.  
18 As additional information or further analysis regarding creditors and other parties in interest in  
19 these Bankruptcy Cases becomes available or known to Coblentz, one or more supplemental  
20 declarations will be submitted to the Court reflecting additional disclosures, if applicable.

21 3. Since the time of Coblentz's conflicts check for the original Declaration and the  
22 Supplemental Declarations, Coblentz has added additional client(s) that match name(s) on the  
23 conflicts check lists Chapter 11 bankruptcy counsel to the Debtors provided to Coblentz on or  
24 about March 4, 2019, as updated on or about April 16, 2019, and again, as updated, on or about  
25 December 20, 2019, or had existing clients that newly appeared on the amended conflicts check  
26 list Coblentz received on December 20, 2019. The additional matched client(s) are as follows:

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Matched Entity	Relationship to Debtors	Relationship to Coblentz
MSD Capital, L.P.	Parties in Rule 2019 Statements	Affiliate or subsidiary of current client(s) in matter(s) unrelated to Debtors or these Bankruptcy Cases; potential former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Pacific Life Insurance Company	Parties in Rule 2019 Statements	Affiliate or subsidiary of current client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Fidelity Management & Research Company	Parties in Rule 2019 Statements	Former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
American General Insurance Company dba ANPAC General Insurance Company	Parties in Rule 2019 Statements/Subrogation Claimants	Former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
State Farm Fire and Casualty Company	Subrogation Claimants	Affiliate or subsidiary of former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Oaktree Capital Management, L.P.	Parties in Rule 2019 Statements/DIP Lenders/Unsecured Notes/DIP Term Loan	Affiliate or subsidiary of current and former clients in matter(s) unrelated to Debtors or these Bankruptcy Cases
Apollo Global Management LLC	Parties in Rule 2019 Statements/DIP Lenders/Unsecured Notes/DIP Term Loan	Potential affiliate or subsidiary of former clients in matter(s) unrelated to Debtors or these Bankruptcy Cases

Matched Entity	Relationship to Debtors	Relationship to Coblentz
Farallon Capital Management LLC	Parties in Rule 2019 Statements/DIP Lenders/Unsecured Notes/DIP Term Loan	Current and/or former client and/or client affiliate in matter(s) unrelated to Debtors or these Bankruptcy Cases
Centerview Partners LLC	Official Committee of Unsecured Creditors Committee – Professionals and Members	Affiliate or subsidiary of current client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Mark S. Johnson	Landlords and Parties to Leases/Interested Parties / Notice of Appearance Parties	Potential affiliate of current and former clients in matter(s) unrelated to Debtors or these Bankruptcy Cases; potential former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Cushman & Wakefield, Inc.	Interested Parties / Notice of Appearance Parties	Affiliate or subsidiary of current and former clients in matter(s) unrelated to Debtors or these Bankruptcy Cases
Dignity Health	Interested Parties / Notice of Appearance Parties	Former client and/or former client affiliate in matter(s) unrelated to Debtors or these Bankruptcy Cases
Elizabeth Jones	Interested Parties / Notice of Appearance Parties	Potential affiliate of former clients in matter(s) unrelated to Debtors or these Bankruptcy Cases

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Matched Entity	Relationship to Debtors	Relationship to Coblentz
Hyundai Corporation USA	Interested Parties / Notice of Appearance Parties	Potential affiliate or subsidiary of former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Judy Wong	Interested Parties / Notice of Appearance Parties	Potential former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Michael Wong	Interested Parties / Notice of Appearance Parties	Potential affiliate of former clients in matter(s) unrelated to Debtors or these Bankruptcy Cases
Robert Robles	Interested Parties / Notice of Appearance Parties	Potential affiliate of former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Saint Francis Memorial Hospital	Interested Parties / Notice of Appearance Parties	Former client; affiliate or subsidiary of current and/or former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
The Lee Family Trust	Interested Parties / Notice of Appearance Parties	Potential affiliate of former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Mark Efren Robinson	Interested Parties / Notice of Appearance Parties	Potential current client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Hanna, Brophy, MacLean, McAleer & Jensen	Ordinary Course Professionals	Current client in matter(s) unrelated to Debtors or these Bankruptcy Cases

Matched Entity	Relationship to Debtors	Relationship to Coblentz
Perkins Coie LLP	Ordinary Course Professionals	Former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
William Thomas Morrow	Former Officers and Directors (Since 2008)/ Retiree Claimants	Potential affiliate of former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Jean Frances Brennan	Retiree Claimants	Potential affiliate of former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
James Howe	Retiree Claimants	Potential affiliate of former client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Russell M. (Russ) Jackson	Retiree Claimants	Potential affiliate of current client in matter(s) unrelated to Debtors or these Bankruptcy Cases
Steven Whelan	Retiree Claimants	Potential affiliate of former client in matter(s) unrelated to Debtors or these Bankruptcy Cases

I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct and that this declaration was executed at San Francisco, California, on February 6, 2020.

/s/ Gregg M. Ficks

Gregg M. Ficks

NOTICE PARTIES

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PG&E Corporation  
c/o Pacific Gas & Electric Company  
77 Beale Street  
San Francisco, CA 94105  
Attn: Janet Loduca, Esq.

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Jane Kim, Esq.

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Lauren T. Attard, Esq.

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